



The UK Modern Slavery Act of 2015

January 2019

The Modern Slavery Act requires a commercial organisation over a certain size to publish a slavery and human trafficking statement each financial year. The statement should disclose the steps the organisation has taken to ensure there is no slavery or trafficking in its supply chains or its own business.

Axalta Coating Systems UK Limited and Axalta Powder Coating Systems UK Limited (together “Axalta UK”) are committed to responsible sourcing and specifically the eradication of human trafficking and slavery in our supply chain. Axalta UK subscribes to the California Transparency In Supply Chains Act 2010 statement of its parent, Axalta Coating Systems LLC (“Axalta”). Axalta abhors and condemns human rights abuses, including child labor, forced labor and slave labor. As of 2018, Axalta has taken the following steps to combat modern slavery.

Supplier requirements

Axalta’s Code of Business Conduct and Ethics requires all Axalta employees and third parties working with Axalta, including suppliers, to comply with all labor laws in the jurisdictions where it operates. Violation of the Code of Business Conduct and Ethics may result in termination of a Supplier or employee. In 2016, Axalta introduced our Supplier Code of Conduct, which outlines the expectations Axalta has of our suppliers. Item 5 in the Axalta Supplier Code of Conduct requires suppliers to respect fundamental human rights: “Suppliers shall ensure that the products and materials they sell to Axalta are not created with child labor, forced labor or through the victims of human trafficking and shall take reasonable steps to eliminate such practices in their supply chains.” We communicate the expectations in our Supplier Code of Conduct through direct communication for our key suppliers, and through our standard contract terms and conditions for all suppliers. Key suppliers have also been asked to certify their adherence to the expectations in Axalta’s Supplier Code of Conduct.

Audits

Axalta may rely on the audit rights in its supplier contracts and the Supplier Code of Conduct, where applicable, to permit Axalta to engage in its own verification process of its suppliers’ representations. Axalta’s standard supplier contract expressly reserves the right to conduct on-site audits of its suppliers to evaluate the supplier’s compliance with labor laws and the expectations in the Supplier Code of Conduct. Axalta anticipates that it may conduct such audits through its own personnel or through a third-party independent auditor, on an announced or unannounced basis. Axalta may also initiate an audit based on findings from Axalta’s Supplier Sustainability Risk Management Program, which screens suppliers on the expectations outlined in the Supplier Code of Conduct.

Training

Axalta provides training to our global procurement staff that work directly with our supply chain partners. In 2018, training focused on the identification of supply chain risks and the methodology of our Supplier Sustainability Risk Management Program.



External initiatives and reporting

Axalta communicates its progress on respecting human rights on an ongoing basis. Updates are available in Axalta's biennial Sustainability Report, on the Human Rights section of our corporate website, and in this statement and our California Transparency In Supply Chains Act 2010 statement. Axalta also supports the Responsible Mica Initiative and the Responsible Minerals Initiative, both of which work to advance responsible sourcing practices and eradicate modern slavery in the mica and minerals supply chains.

As we expand our business activities and work with Suppliers domestically and globally to meet customers' needs, Axalta remains committed to upholding human rights and safety in our supply chain.

A handwritten signature in black ink, appearing to read 'TO', followed by a horizontal line extending to the right.

Tabitha Oman

Vice President, Deputy General Counsel and Chief Compliance Officer

January 2019